

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division**

RON L. LACKS, PERSONAL
REPRESENTATIVE FOR THE ESTATE OF
HENRIETTA LACKS,

Plaintiff,

Case No.: 1:24-cv-02267-DLB

v.

NOVARTIS PHARMACEUTICALS
CORPORATION, et al.,

Defendants.

**STIPULATION AND [PROPOSED] ORDER FOR
EXTENSION OF TIME TO RESPOND**

Plaintiff Ron L. Lacks, Personal Representative for the Estate of Henrietta Lacks, and Defendants Novartis Pharmaceuticals Corporation, Novartis Gene Therapies Inc. (together, “Novartis”), Viatris Inc. and Mylan Pharmaceuticals Inc. (together, “Viatris”) (Novartis and Viatris, together “Defendants”) (Plaintiff, Novartis, and Viatris, collectively the “Parties”) hereby stipulate and agree to an extension of time for Novartis and Viatris to respond to Plaintiff’s Complaint (ECF No. 1) (the “Complaint”), and request the Court enter the following Order in accordance with Local Rule 105.9.

1. Novartis Gene Therapies Inc. was served with the Complaint on August 26, 2024.
2. Viatris Inc. was served with the Complaint on August 27, 2024.
3. Novartis Pharmaceuticals Corporation was served with the Complaint on September 3, 2024.
4. On September 12, 2024, the Parties stipulated and agreed to extend the deadline for Defendants to respond to the Complaint to November 22, 2024 (ECF No. 8).

5. The Court granted the extension on September 13, 2024 (ECF No. 9).
6. On November 14, 2024, the Parties stipulated and agreed to extend the deadline for Defendants to respond to the Complaint to January 17, 2025 (ECF No. 14).
7. The Court granted the extension on November 15, 2024 (ECF No. 15).
8. On January 3, 2025, the Parties stipulated and agreed to extend the deadline for Defendants to respond to the Complaint to February 17, 2025 (ECF No. 16).
9. The Court granted the extension on January 3, 2025 (ECF No. 17).
10. On February 12, 2025, the Parties stipulated and agreed to extend the deadline for Defendants to respond to the Complaint to March 18, 2025 (ECF No. 18).
11. The Court granted the extension on February 13, 2025 (ECF No. 19).
12. On March 14, 2025, the Parties stipulated and agreed to extend the deadline for Defendants to respond to the Complaint to April 25, 2025 (ECF No. 20).
13. The Court granted the extension on March 14, 2025 (ECF No. 21).
14. On April 23, 2025, the Parties stipulated and agreed to extend the deadline for Defendants to respond to the Complaint to May 30, 2025 (ECF No. 23).
15. The Court granted the extension on April 23, 2025 (ECF No. 24).
16. On May 29, 2025, the Parties stipulated and agreed to extend the deadline for Defendants to respond to the Complaint to July 29, 2025 (ECF No. 25).
17. The Court granted the extension on June 2, 2025 (ECF No. 26).
18. The Parties now agree to extend the deadline for Defendants' response to the Complaint to October 31, 2025.

19. The Parties further agree that nothing in this stipulation shall constitute a waiver by Defendants of personal jurisdiction or any other defenses that may be available to them. Defendants expressly reserve their rights to raise any such defenses.

WHEREFORE, the Parties stipulate and agree to the extension as described above and respectfully request that the Court enter an order establishing this stipulated extension as agreed by the Parties.

Dated: July 28, 2025

Respectfully submitted,

/s/
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 permission of Christopher L. Ayers)
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Attorneys for Plaintiff

**Pro hac vice admission applications to be filed*

SO ORDERED.

Dated: _____

Deborah L. Boardman
United States District Judge

CERTIFICATE OF SERVICE

I certify that I served a copy of this Stipulation and Proposed Order for Extension of Time to Respond using the CM/ECF system, which sent notification of the filing to all counsel of record on July 28, 2025.

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